

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
21-cv-270**

Rupa Vickers Russe)	
)	
)	MOTION TO SEAL
v.)	PLAINTIFF'S
)	MEDICAL RECORDS
Cindie Harman,)	
Defendant.)	

NOW COMES Plaintiff and makes this Motion for Leave to File Under Seal pursuant to Rule 5.2(f) of the Federal Rules of Civil Procedure, and 42 U.S.C. 1320d-2, to respectfully request this Court grant her leave to disclose to the Court and file under seal copies of her medical records. These records contain sensitive information that are protected under 42 U.S.C. 1320d-2, and which have been previously duly disclosed to Defendant pursuant to, and in conformance with, this Court's Protective Order. The records contain information disclosed to Plaintiff's healthcare providers in confidence, and Plaintiff's privacy would be unfairly invaded if these records were made part of the public court record at this stage of the litigation. Additionally, they contain many references to Plaintiff's child, who was a minor at that time, and it would be inappropriate and irrelevant for this information to be made public.

Submitted this the 20th of January, 2023.

By: /s/Brooke Scott
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CERTIFICATE OF SERVICE

This certifies that I caused a true and correct copy of the foregoing document to be served on 20th of January, 2023 by uploading a copy to this Court's CM/ECF electronic filing system of which Defendant's counsel of record is believed to be an authorized registrant.

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